

EXHIBIT 2

From: Jeff Nardinelli
Sent: Thursday, June 15, 2017 6:27 PM
To: Brun, Shane; Kaitlyn Murphy
Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

I spoke with the client today about images of Levandowski's machines. They do not agree to make any images available for inspection, at least without an articulation of what you'd be looking for.

Thanks,
Jeff

From: Brun, Shane [mailto:SBrun@goodwinlaw.com]
Sent: Wednesday, June 14, 2017 4:27 PM
To: Kaitlyn Murphy <kmurphy@BSFLLP.com>; Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>
Cc: Brun, Shane <SBrun@goodwinlaw.com>
Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

Good. Here's the call-in info:

Dial-in: (877)659-4128

Access code: 7730962

Thanks,
Shane

From: Kaitlyn Murphy [mailto:kmurphy@BSFLLP.com]
Sent: Wednesday, June 14, 2017 4:21 PM
To: Brun, Shane; Jeff Nardinelli
Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

I'm available at 9AM tomorrow.

Thanks,
Kaitlyn Murphy

From: Brun, Shane [mailto:SBrun@goodwinlaw.com]
Sent: Wednesday, June 14, 2017 4:17 PM
To: Jeff Nardinelli
Cc: Kaitlyn Murphy; Brun, Shane
Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

Ok, thanks. Kaitlyn will join the call as well. Kaitlyn, does 9 am tomorrow morning work for you. I'll send around a call-in number beforehand.

From: Jeff Nardinelli [mailto:jeffnardinelli@quinnemanuel.com]
Sent: Wednesday, June 14, 2017 4:14 PM
To: Brun, Shane
Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

No problem, I'm free then.

From: Brun, Shane [<mailto:SBrun@goodwinlaw.com>]
Sent: Wednesday, June 14, 2017 4:13 PM
To: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>
Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

Hey Jeff, I'm running late today. Can we do this at 9 am tomorrow?

From: Jeff Nardinelli [<mailto:jeffnardinelli@quinnemanuel.com>]
Sent: Wednesday, June 14, 2017 2:13 PM
To: Brun, Shane; Walsh, Rachel M.; QE-Waymo
Cc: Boies Service (BSF_EXTERNAL_UberWaymoLit@bsflp.com); UberWaymoMoFoAttorneys; Chatterjee, Neel; Schuman, Brett
Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

Sounds good. I will call you then at 415 733 6074.

From: Brun, Shane [<mailto:SBrun@goodwinlaw.com>]
Sent: Wednesday, June 14, 2017 2:10 PM
To: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; Walsh, Rachel M. <RWalsh@goodwinlaw.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Cc: Boies Service (BSF_EXTERNAL_UberWaymoLit@bsflp.com) <BSF_EXTERNAL_UberWaymoLit@bsflp.com>; UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Chatterjee, Neel <NChatterjee@goodwinlaw.com>; Schuman, Brett <BSchuman@goodwinlaw.com>
Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

How about at 5? You can call my office. Thanks

From: Jeff Nardinelli [<mailto:jeffnardinelli@quinnemanuel.com>]
Sent: Wednesday, June 14, 2017 11:01 AM
To: Brun, Shane; Walsh, Rachel M.; QE-Waymo
Cc: Boies Service (BSF_EXTERNAL_UberWaymoLit@bsflp.com); UberWaymoMoFoAttorneys; Chatterjee, Neel; Schuman, Brett
Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

Shane,

No problem. I'm free today for a follow-up call where we can go over the highlighted RFPs specifically.

Thanks,
Jeff

From: Brun, Shane [<mailto:SBrun@goodwinlaw.com>]
Sent: Tuesday, June 13, 2017 3:53 PM
To: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; Walsh, Rachel M. <RWalsh@goodwinlaw.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Cc: Boies Service (BSF_EXTERNAL_UberWaymoLit@bsflp.com) <BSF_EXTERNAL_UberWaymoLit@bsflp.com>; UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Chatterjee, Neel

<NChatterjee@goodwinlaw.com>; Schuman, Brett <BSchuman@goodwinlaw.com>

Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

Jeff,

Following our discussion of these RFPs, we were expecting more information than this. For the highlighted requests below, please tell us by the end of the day tomorrow what Waymo agrees to produce and further what documents Waymo is withholding, if any, based on its objection that the requests go beyond Waymo's allegations in the litigation. Our subsequent discussion with Special Master Cooper will be much more efficient with this information.

Thanks,
Shane

Shane Brun



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From: Jeff Nardinelli [<mailto:jeffnardinelli@quinnemanuel.com>]

Sent: Monday, June 12, 2017 1:02 PM

To: Walsh, Rachel M.; QE-Waymo

Cc: Boies Service (BSF_EXTERNAL_UberWaymoLit@bsfllp.com); UberWaymoMoFoAttorneys; Chatterjee, Neel; Schuman, Brett; Brun, Shane

Subject: RE: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

Rachel,

Waymo initially objects to certain of Otto Trucking's first set of RFPs (nos. 1-51) as follows. We are happy to discuss further with Special Master Cooper.

RFP Nos. 37-39, 42, 43: These requests concern the content of the SVN server, which Anthony Levandowski downloaded in its entirety in December 2015. These files have been and remain available for inspection under the source code provisions of the protective order.

RFP Nos. 40, 41: Waymo objects to these requests concerning Waymo's data management systems to the extent they relate to systems not at issue in this litigation.

RFP Nos. 5, 8, 25, 29, 46: Waymo has already produced documents supporting and explaining Waymo's forensic investigation into Mr. Levandowski's computers. See WAYMO-UBER-00000648-943.

RFP No. 45: Waymo objects to this request, which seeks a copy of any image or backup files of Mr. Levandowski's Waymo-issued electronic devices.

RFP Nos. 6, 15, 16, 19, 20, 21, 26, 30, 31, 33, 34, 44: Waymo objects to these requests to the extent they go beyond Waymo's allegations in this litigation.

RFP Nos. 2-4, 7, 9-14, 17, 18, 22-24, 35, 36: Waymo objects to these requests to the extent they go beyond Waymo's allegations in the litigation.

From: Walsh, Rachel M. [<mailto:RWalsh@goodwinlaw.com>]
Sent: Wednesday, May 17, 2017 7:39 PM
To: QE-Waymo <gewaymo@quinnemanuel.com>
Cc: Boies Service (BSF_EXTERNAL_UberWaymoLit@bsfllp.com) <BSF_EXTERNAL_UberWaymoLit@bsfllp.com>;
UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; Chatterjee, Neel
<NChatterjee@goodwinlaw.com>; Schuman, Brett <BSchuman@goodwinlaw.com>; Brun, Shane
<SBrun@goodwinlaw.com>
Subject: Waymo v. Uber - Defendant Otto Trucking's First Set of RFPs

Counsel,

Attached for service is Defendant Otto Trucking's First Set of Requests for Production. These Requests do not contain Otto Trucking's confidential or AEO information, and defendant does not believe that they contain confidential or AEO information of plaintiff.

Regards,

Rachel

Rachel M. Walsh



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